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May 17, 2023

Via ECF

The Honorable Cathy Seibel United States District Court Judge Charles L. Brieant United States Courthouse 300 Quarropas Street White Plains, New York 10601

Re:

USA v. Downey 23-cr-00087 (CS)

ECF No. 41-2. Counsel for Defendant shall refile the entire sentencing submission with the proper redactions in Exhibit B.

The Clerk of Court is respectfully directed to seal

SO ORDERED.

5/31/23

CATHY SEIBEL, U.S.D.J.

Dear Judge Seibel:

The undersigned and The Quinn Law Firm, PLLC, represents Defendant Brian Downey in the above-referenced matter.

I am writing to respectfully request that the Court permanently seal Attachment # 2 to Docket Entry Number 41, titled "Exhibit B – Letters". We mistakenly filed a version of the exhibit with unredacted addresses of individuals who wrote letters to the Court.

We apologize for this error and oversight. My office has contacted the SDNY ECF Help Desk and notified them of the error so that they can temporarily seal the records from the public. We will file the correct, redacted version of the submission to ECF.

Thank you for your time and attention to this matter.

Respectfully submitted,

Andrew Quinn

Andrew C. Quinn, Esq